

**REMARKS**

Claims 1, 3-7, 9-12, 14-22 are pending in this application. By this Amendment, claims 2, 8 and 13 are cancelled, claims 1, 9 and 12 are amended, and claims 21-22 are added.

I. **Formal Matters**

Applicants acknowledge the indication that claim 19 contains allowable subject matter.

Attached are a marked-up copy of the originally filed specification and a clean substitute specification in accordance with 37 C.F.R. §§1.121(b)(3) and 1.125(c). The substitute specification contains no new matter. It has only been amended to substitute corresponding serial numbers and/or patent numbers for co-pending applications originally identified by attorney docket number.

An Information Disclosure Statement and Form PTO-1449 are enclosed disclosing a reference to be considered. Return of an initialed Form PTO-1449 with the next Patent Office communication is requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiners Carter and Wallerson in the May 20 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

II. **Pending Claims Define Over the Applied Art**

In the Office Action claims 1-7, 11-13, 17-18 are rejected under 35 U.S.C. §102(e) over U.S. Patent No. 6,275,600 to Banker. Additionally, claims 8, 10, 14-16 and 20 are rejected under 35 U.S.C. §103(a) over Banker in view of U.S. Patent No. 5,365,310 to Jenkins. These rejections are respectfully traversed.

Claims 1 and 12 are amended to incorporate the features of cancelled claims 2 and 13, respectively. Claim 9 is amended to incorporate the subject matter of cancelled claim 8. The

amended claims are directed to an image quality analysis system and method that quantify image quality results that are based on human visual system models so that only those differences perceptible by a human viewer are determined. See Applicants' specification at, for example, page 12, lines 20-25, page 8, lines 8-33, and page 10, line 30 to page 11, line 22.

While Banker is directed to an image quality analysis system, it fails to appreciate the problem overcome by the invention. In fact, to the contrary, it suggests on col. 2, lines 50-59 that a scanner should have at least twice the resolution of the printer. This requires not only a high quality scanner, but may often result in erroneous quality control issues if the resolution power of the scanner is greatly above that perceptible by a human. In other words, when a high resolution quality analysis is performed, errors/differences may be detected and corrected that could not even be perceived or appreciated by the human viewer. As such, unnecessary rejection or adjustments may be made. However, when the results are modeled after a human visual system, only those differences perceptible by a human vision system are detected. As such, an automated system can detect and correct image quality problems perceptible by a human, without unnecessarily fixing or identifying image quality problems that may be machine detectable, but not human detectable. New dependent claims 21-22 clarify a particular way to achieve such modeling.

Because Banker fails to teach or suggest each and every feature of independent claims 1 or 12, these claims and the claims dependent therefrom define over Banker.

Jenkins fails to overcome the deficiencies of Banker with respect to independent claims 1 and 12.

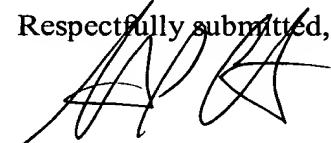
Withdrawal of the rejections is respectfully requested.

III. Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3-7, 9-12, and 14-22 are earnestly solicited.

Should the Examiner believe that anything further is desirable in order to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:SPC/can

Date: May 22, 2003

Attachments:

Information Disclosure Statement and Form PTO-1449 and 1 reference.  
Substitute Specification  
Mark-up of Specification

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